

Statement of Basis of the Federal Operating Permit

E. I. du Pont de Nemours and Company

Site/Area Name: F-Unit Copolymers
Physical location: 2697 Old Bloomington Rd N
Nearest City: Victoria
County: Victoria

Permit Number: O1903
Project Type: Renewal

Standard Industrial Classification (SIC) Code: 2869
SIC Name: Industrial Organic Chemicals

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: July 13, 2015

Operating Permit Basis of Determination

Permit Area Process Description

The production of polyethylene and copolymer resins involves the circulation and re-circulation of large quantities of ethylene gas in a process loop consisting of various compression, cooling, reaction, and separation stages. Production of copolymer resins involves the addition of comonomer materials in the reactor feed stream portion of the gas circulation loop. The production of many homopolymer and copolymer resins also requires the addition of telogens (usually propane or propylene) which act as product property modifiers. Some telogens and some comonomers, which are not completely consumed in the reaction stage of the process, are recycled along with the recycled ethylene in repetitive passes through the reactor.

Reactant materials are compressed to 6,000 psi by the Recycle Compressors, and to 15,000 to 30,000 psi by Hyper Compressors, prior to entering the autoclave reactors. Initiator is injected into the reactor to feed initiative polymerization. Polymer gas effluent from the reactor is separated in the high/low pressure separators (HPS/LPS). Ethylene is recycled to the purge and make-up compressors.

Polymer from the LPS is fed to extruders for degassing, after which it is extruded, pelletized, and water cooled. The wet pellets are sieved and dried and sent to blenders for final degassing with air. The product pellets are loaded into hopper cars for shipment.

FOPs at Site

The “application area” consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, NOX, HAPS, CO
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Reading State of Texas’s Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as “applicable requirements”) that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - New Source Review Authorization Requirements
 - Compliance Requirements
 - Protection of Stratosphere Ozone
 - Permit Location
 - Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - Alternative Requirements
- Appendix A
 - Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the

requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the “index number,” detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by

30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3. A. for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions

All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit's Applicable Requirement Summary. The basis for the applicability determinations for these vents are listed in the Determination of Applicable Requirements table.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes

40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.

13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column “Changes and Exceptions to RRT.” If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word “None” will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled “Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected.”

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled “Basis for Applying Permit Shields” specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
05GEN003	40 CFR Part 63, Subpart ZZZZ	63ZZZZC	<p>Crankcase = The stationary CI RICE is not equipped with a closed crankcase ventilation system.</p> <p>HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.</p> <p>Brake HP = Stationary RICE with a brake hp greater than or equal to 300 hp and less than or equal to 500 hp.</p> <p>Performance Test = No previous performance test used, a performance test is conducted to demonstrate initial compliance</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.</p> <p>Control Technique = Control technique other than an oxidation catalyst</p> <p>Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.</p> <p>Emission Limitation = Limiting the concentration of carbon monoxide in the stationary RICE exhaust.</p> <p>Operating Limits = Using the control techniques approved in Subpart ZZZZ</p> <p>Monitoring System = Monitoring system other than a CPMS or CEMS</p> <p>Service Type = Emergency use where the RICE operates or is contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or that operates for the purpose specified in 40 CFR §63.6640(f)(4)(ii).</p> <p>Stationary RICE Type = Existing non-emergency CI RICE with a site rating of more than 300 HP located at an area source that is certified to the Tier 3 (Tier 2 for engines above 560 kilowatt (kW)) emission standards electing to comply with 40 CFR Part 60, Subpart IIII).</p>
05GEN-01	40 CFR Part 63, Subpart ZZZZ	63ZZZZC	<p>HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.</p> <p>Brake HP = Stationary RICE with a brake hp greater than or equal to 100 and less than 250 hp.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Displacement = The stationary CI RICE has a displacement less than 30 liters per cylinder and uses diesel fuel.</p> <p>Service Type = Emergency use where the RICE operates or is contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or that operates for the purpose specified in 40 CFR §63.6640(f)(4)(ii).</p> <p>Stationary RICE Type = Compression ignition engine</p>
GRPo5COM1	40 CFR Part 63, Subpart ZZZZ	63ZZZZA	<p>HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.</p> <p>Brake HP = Stationary RICE with a brake hp greater than 500.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Service Type = Normal use.</p> <p>Stationary RICE Type = 2 stroke spark ignited lean burn engine</p>

Unit ID	Regulation	Index Number	Basis of Determination*
GRPo5COM2	40 CFR Part 63, Subpart ZZZZ	63ZZZZB	<p>Crankcase = The stationary CI RICE is not equipped with a closed crankcase ventilation system.</p> <p>HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.</p> <p>Brake HP = Stationary RICE with a brake hp greater than or equal to 300 hp and less than or equal to 500 hp.</p> <p>Performance Test = A performance test has been previously conducted that meets the conditions in 40 CFR § 63.6610(d)(1)-(5).</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Control Technique = Control technique other than an oxidation catalyst</p> <p>Different Schedule = Schedule specified in Subpart ZZZZ for submission of reports applies.</p> <p>Emission Limitation = Limiting the concentration of carbon monoxide in the stationary RICE exhaust.</p> <p>Operating Limits = Using the control techniques approved in Subpart ZZZZ</p> <p>Displacement = The stationary CI RICE has a displacement of 30 liters or more per cylinder and uses diesel fuel or has a displacement less than 30 liters per cylinder and does not use diesel fuel.</p> <p>Monitoring System = Monitoring system other than a CPMS or CEMS</p> <p>Service Type = Normal use.</p> <p>Stationary RICE Type = 2 stroke spark ignited lean burn engine</p>
05BINo26	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is less than or equal to 1,000 gallons</p>
05BINo26	40 CFR Part 60, Subpart Kb	60KBC	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>
05BINo26	40 CFR Part 63, Subpart FFFF	63FFFF	<p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Emission Standard = HAP vapor pressure is less than 76.6 and a flare is being used for control per § 63.2470(a)-Table 4.1.b.iii.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is used.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = No bypass lines.</p>
05DMPo34A	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is less than or equal to 1,000 gallons</p>
05DMPo34A	40 CFR Part 60, Subpart Kb	60KBC	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>
05OP1	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is less than or equal to 1,000 gallons</p>

Unit ID	Regulation	Index Number	Basis of Determination*
05OP12	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
05OP13	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
05OP14	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
05OP15	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
05OP16	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
05OP17	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
05OP18	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
05OP19	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
05OP2	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons

Unit ID	Regulation	Index Number	Basis of Determination*
05OP26	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
05OP3	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
05OP4	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
05OP6	40 CFR Part 60, Subpart Kb	60KB	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
05SEP051	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
05SEP051	40 CFR Part 60, Subpart Kb	60KB	Product Stored = Waste mixture of indeterminate or variable composition Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
05SMP033	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
05SMP033	40 CFR Part 60, Subpart Kb	60KBC	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
05SMP034	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
05SMP034	40 CFR Part 60, Subpart Kb	60KBC	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)

Unit ID	Regulation	Index Number	Basis of Determination*
05TFL018	30 TAC Chapter 115, Storage of VOCs	TFL18R5112	<p>Construction Date = On or after May 12, 1973</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using an internal floating roof (IFR)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
05TFL018	40 CFR Part 63, Subpart FFFF	63FFFFTFR	<p>Emission Standard = HAP vapor pressure is < 76.6 and the unit is complying with 40 CFR Part 63, subpart WW per § 63.2470(a)-Table 4.1.b.i.</p> <p>WW Tank Control = An internal floating roof is operated and maintained per 40 CFR § 63.1062(a)(1).</p> <p>Notification = The referencing subpart requires notification of initial startup.</p> <p>Unslotted Guide Pole = The tank uses an unslotted guide pole.</p> <p>Wiper or Seal = The unslotted guide pole is equipped with a pole wiper and a pole sleeve.</p> <p>Seal Configuration = Mechanical shoe seal.</p>
05TFL022	30 TAC Chapter 115, Storage of VOCs	TFL22R5112	<p>Construction Date = On or after May 12, 1973</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using an internal floating roof (IFR)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
05TFL022	40 CFR Part 63, Subpart FFFF	63FFFFTFR	<p>Emission Standard = HAP vapor pressure is < 76.6 and the unit is complying with 40 CFR Part 63, subpart WW per § 63.2470(a)-Table 4.1.b.i.</p> <p>WW Tank Control = An internal floating roof is operated and maintained per 40 CFR § 63.1062(a)(1).</p> <p>Notification = The referencing subpart requires notification of initial startup.</p> <p>Unslotted Guide Pole = The tank uses an unslotted guide pole.</p> <p>Wiper or Seal = The unslotted guide pole is equipped with a pole wiper and a pole sleeve.</p> <p>Seal Configuration = Mechanical shoe seal.</p>
05TFL023	30 TAC Chapter 115, Storage of VOCs	TFL23R5112	<p>Construction Date = On or after May 12, 1973</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using an internal floating roof (IFR)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>

Unit ID	Regulation	Index Number	Basis of Determination*
05TFL023	40 CFR Part 60, Subpart Kb	60Kb	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal
05TFL023	40 CFR Part 63, Subpart FFFF	63FFFFTFR	Emission Standard = HAP vapor pressure is < 76.6 and the unit is complying with 40 CFR Part 63, subpart WW per § 63.2470(a)-Table 4.1.b.i. WW Tank Control = An internal floating roof is operated and maintained per 40 CFR § 63.1062(a)(1). Notification = The referencing subpart requires notification of initial startup. Unslotted Guide Pole = The tank uses an unslotted guide pole. Wiper or Seal = The unslotted guide pole is equipped with a pole wiper and a pole sleeve. Seal Configuration = Mechanical shoe seal.
05TFX039	30 TAC Chapter 115, Storage of VOCs	R5117A	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons
05TFX041	30 TAC Chapter 115, Storage of VOCs	R5117D	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons
05TFX041	40 CFR Part 60, Subpart Kb	60KB	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia
05TFX042	30 TAC Chapter 115, Storage of VOCs	R5117D	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons
05TFX042	40 CFR Part 60, Subpart Kb	60KB	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia

Unit ID	Regulation	Index Number	Basis of Determination*
05TFX042	40 CFR Part 63, Subpart FFFF	63FFFFTXA	<p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Emission Standard = HAP vapor pressure is < 76.6 and a non-flare CD is being used to meet 95% reduction per § 63.2470(a)-Table 4.1.b.ii</p> <p>CEMS = A continuous parameter monitoring system is used.</p> <p>HAL Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Prior Test = The data from a prior performance test is not used.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p> <p>Meets 63.998(b)(2) = The control device meets criteria in § 63.985(b)(2).</p> <p>Test Waiver = The Administrator has not granted a waiver of the performance test or no waiver has been requested.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = No bypass lines.</p>
05TFX043	30 TAC Chapter 115, Storage of VOCs	TFX43R5112	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>
05TFX043	40 CFR Part 60, Subpart Kb	60KB	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)</p>
05TFX045	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is less than or equal to 1,000 gallons</p>
05TFX045	40 CFR Part 60, Subpart Kb	60KB	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>
05TFX047	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is less than or equal to 1,000 gallons</p>
05TFX047	40 CFR Part 60, Subpart Kb	60KB	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>

Unit ID	Regulation	Index Number	Basis of Determination*
05TFX049A	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
05TFX049A	40 CFR Part 60, Subpart Kb	60KB	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>
05TFX052	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
05TFX052	40 CFR Part 60, Subpart Kb	60KB	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>
05TFX215	30 TAC Chapter 115, Storage of VOCs	R5112A	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is less than or equal to 1,000 gallons</p>
05TFX215	40 CFR Part 60, Subpart Kb	60KBA	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>
05TOT024B	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
05TOT024B	40 CFR Part 60, Subpart Kb	60KB	<p>Product Stored = Waste mixture of indeterminate or variable composition</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>

Unit ID	Regulation	Index Number	Basis of Determination*
GRPo5TK001	30 TAC Chapter 115, Storage of VOCs	R5112	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
05LTC051	30 TAC Chapter 115, Loading and Unloading of VOC	R5217	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Only loading.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia.</p>
05LTC052	30 TAC Chapter 115, Loading and Unloading of VOC	R5217	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Only unloading.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia.</p>
05LTC053	30 TAC Chapter 115, Loading and Unloading of VOC	R5217	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Only unloading.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia.</p>
05LTC200	30 TAC Chapter 115, Loading and Unloading of VOC	R5217	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Only unloading.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia.</p>
05LTR022A	30 TAC Chapter 115, Loading and Unloading of VOC	R5211	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Loading and unloading.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
05LTR036	30 TAC Chapter 115, Loading and Unloading of VOC	LTR36R5211	<p>Chapter 115 Control Device Type = No control device.</p> <p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Only unloading.</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.</p> <p>Daily Throughput = Daily throughput not determined since 30 TAC § 115.217(a)(2)(A) or 30 TAC § 115.217(b)(3)(A) exemption is not utilized.</p> <p>Control Options = Pressurized loading system.</p>
05LTR043B	30 TAC Chapter 115, Loading and Unloading of VOC	R5217	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Only loading.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia.</p>
GRP05LD005	30 TAC Chapter 115, Loading and Unloading of VOC	R5211	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Only unloading.</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.</p> <p>Daily Throughput = Loading less than 20,000 gallons per day.</p>
GRP05LD006	30 TAC Chapter 115, Loading and Unloading of VOC	GRLD6R5211	<p>Chapter 115 Control Device Type = Vapor control system with a direct flame incinerator.</p> <p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Loading and unloading.</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia.</p> <p>Daily Throughput = Daily throughput not determined since 30 TAC § 115.217(a)(2)(A) or 30 TAC § 115.217(b)(3)(A) exemption is not utilized.</p> <p>Control Options = Vapor control system that maintains a control efficiency of at least 90%.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
GRPo5LD006	40 CFR Part 63, Subpart FFFF	63FFFFLD	<p>Emission Standard = A non-flare CD is being used to meet 98% reduction per § 63.2475(a) - Table 5.1.a.</p> <p>Meets 63.988(b)(2) = The control device does not meet criteria in § 63.985(b)(2).</p> <p>Small Device = A small control device (defined in § 63.2550) is not being used.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Determined Hal = The emission stream is determined to be nonhalogenated.</p> <p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment.</p> <p>CEMS = Continuous parameter monitoring is used.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p> <p>Bypass Line = No bypass lines.</p>
GRPo5LD007	30 TAC Chapter 115, Loading and Unloading of VOC	R5211	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline.</p> <p>Transfer Type = Loading and unloading.</p> <p>True Vapor Pressure = True vapor pressure is less than 1.5 psia.</p>
05FLRo40	30 TAC Chapter 111, Visible Emissions	R1111	<p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p> <p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p>
05FLRo40	40 CFR Part 63, Subpart A	63A	<p>Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63.</p> <p>Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8).</p> <p>Flare Assist Type = Steam assisted</p> <p>Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>
05FUG	40 CFR Part 63, Subpart FFFF	63FFFF	Existing Source = Fugitive unit contains equipment in an existing Miscellaneous Chemical Processing Unit.
05CLTo21	40 CFR Part 63, Subpart FFFF	63FFFF	Monitoring = The cooling water is being monitored for the presence of HAPs or other representative substances that would indicate a leak.
05CLTo21	40 CFR Part 63, Subpart Q	CLTo2163Q	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.
05CLTo21A	40 CFR Part 63, Subpart Q	CLTo21A63Q	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.

Unit ID	Regulation	Index Number	Basis of Determination*
05SEP051A	30 TAC Chapter 115, Water Separation	R5131	<p>Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.</p> <p>Exemption = Any single or multiple compartment VOC water separator which separates less than 200 gallons (757 liters) a day of materials containing VOC obtained from any equipment.</p>
05BLN008	40 CFR Part 63, Subpart FFFF	63FFFF	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a non-flare CD is being used to meet 98% reduction per § 63.2455(a) - Table 1.1.a.i.</p> <p>Hal Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Meets 63.988(b)(2) = The control device meets criteria in § 63.985(b)(2).</p> <p>Small Device = A small control device (defined in § 63.2550) is not being used.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no waiver is requested.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = No bypass lines.</p> <p>CEMS = A CEMS is not used.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p>
05BLN009	40 CFR Part 63, Subpart FFFF	63FFFF	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a non-flare CD is being used to meet 98% reduction per § 63.2455(a) - Table 1.1.a.i.</p> <p>Hal Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Meets 63.988(b)(2) = The control device meets criteria in § 63.985(b)(2).</p> <p>Small Device = A small control device (defined in § 63.2550) is not being used.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no waiver is requested.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = No bypass lines.</p> <p>CEMS = A CEMS is not used.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
05FLR110	30 TAC Chapter 115, Vent Gas Controls	R5121	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p>
05FLR110	40 CFR Part 63, Subpart FFFF	63FFFFA	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a flare is being used for control.</p> <p>Hal Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no waiver is requested.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or a waiver has not been requested.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = No bypass lines.</p>
05FLT051	30 TAC Chapter 115, Vent Gas Controls	FLT51R5121-A	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Vapor recovery system, as defined in 30 TAC § 115.10, other than an afterburner, blast furnace combustion device, boiler, catalytic or direct flame incinerator, carbon adsorption system, chiller, flare or vapor combustor.</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C and above).</p> <p>VOC Concentration = VOC concentration is greater than or equal to 30,000 ppmv.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
05FLT051	30 TAC Chapter 115, Vent Gas Controls	FLT51R5121-B	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Vent gas stream emissions of the specified classes of VOCs including aldehydes, alcohols, aromatics, ethers, olefins, peroxides, amines, acids, esters, ketones, sulfides, and branched chain hydrocarbons (C and above).</p> <p>VOC Concentration = VOC concentration is greater than or equal to 30,000 ppmv.</p>
05FLT051	40 CFR Part 63, Subpart FFFF	63FFFFB	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a non-flare CD is being used to meet 98% reduction per § 63.2455(a) - Table 1.1.a.i.</p> <p>Hal Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Meets 63.988(b)(2) = The control device does not meet the criteria in § 63.985(b)(2).</p> <p>Small Device = A small control device (defined in § 63.2550) is not being used.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no waiver is requested.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = No bypass lines.</p> <p>CEMS = A CEMS is not used.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p>
05INC-030VNT	30 TAC Chapter 111, Visible Emissions	R1111A	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
05OVN-032	30 TAC Chapter 115, Vent Gas Controls	R5127	<p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
05OVN-032A	30 TAC Chapter 115, Vent Gas Controls	R5127	<p>Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.</p>
05RSY207	30 TAC Chapter 115, Vent Gas Controls	VT207R5121	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Vent gas stream emissions of ethylene associated with the formation, handling, and storage of solidified low-density polyethylene in which more than 1.1 pounds of ethylene per 1,000 pounds of product are emitted.</p>
05RSY207	40 CFR Part 63, Subpart FFFF	63FFFA	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a flare is being used for control.</p> <p>Hal Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no waiver is requested.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or a waiver has not been requested.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = No bypass lines.</p>
GRPo5COM-VNT	30 TAC Chapter 111, Visible Emissions	R1111A	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
GRPo5CS010	30 TAC Chapter 115, Vent Gas Controls	GRVT10R5121	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Control Device Type = Smokeless flare</p> <p>Vent Type = Vent gas stream emissions of ethylene associated with the formation, handling, and storage of solidified low-density polyethylene in which more than 1.1 pounds of ethylene per 1,000 pounds of product are emitted.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
GRP05CS010	40 CFR Part 63, Subpart FFFF	63FFFFA	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a flare is being used for control.</p> <p>Hal Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no waiver is requested.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or a waiver has not been requested.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = No bypass lines.</p>
GRP05VT003	30 TAC Chapter 115, Vent Gas Controls	GRVT3R5121	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C).</p> <p>Vent Type = Vent gas stream emissions of ethylene associated with the formation, handling, and storage of solidified low-density polyethylene in which more than 1.1 pounds of ethylene per 1,000 pounds of product are emitted.</p>
GRP05VT003	40 CFR Part 63, Subpart FFFF	63FFFFB	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a non-flare CD is being used to meet 98% reduction per § 63.2455(a) - Table 1.1.a.i.</p> <p>Hal Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Meets 63.988(b)(2) = The control device does not meet the criteria in § 63.985(b)(2).</p> <p>Small Device = A small control device (defined in § 63.2550) is not being used.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no waiver is requested.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = No bypass lines.</p> <p>CEMS = A CEMS is not used.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
GRPo5VT009	30 TAC Chapter 115, Vent Gas Controls	GRVT9R5121	Alternate Control Requirement = Alternate control is not used. Control Device Type = Smokeless flare Vent Type = Vent gas stream emissions of ethylene associated with the formation, handling, and storage of solidified low-density polyethylene in which more than 1.1 pounds of ethylene per 1,000 pounds of product are emitted.
GRPo5VT009	40 CFR Part 63, Subpart FFFF	63FFFFA	Designated Grp1 = The emission stream is designated as Group 1. Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a flare is being used for control. Hal Device Type = No halogen scrubber or other halogen reduction device is used. Designated Hal = The emission stream is not designated as halogenated. Determined Hal = The emission stream is determined to be non-halogenated. Prior Eval = The data from a prior evaluation or assessment is not used. Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no waiver is requested. Prior Eval = The data from a prior evaluation or assessment is not used. Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or a waiver has not been requested. Formaldehyde = The stream does not contain formaldehyde. Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure. Bypass Line = No bypass lines.
05DEG208	30 TAC Chapter 115, Degreasing Processes	R5412	Solvent Degreasing Machine Type = Cold solvent cleaning machine. Alternate Control Requirement = The TCEQ Executive Director has not approved an alternative control requirement as allowed under 30 TAC § 115.413 or not alternative has been requested. Solvent Sprayed = A solvent is sprayed. Solvent Vapor Pressure = Solvent vapor pressure is less than or equal to 0.6 psia as measured at 100 degrees Fahrenheit. Solvent Heated = The solvent is not heated to a temperature greater than 120° F. Parts Larger than Drainage = No cleaned parts for which the machine is authorized to clean are larger than the internal drainage facility of the machine. Drainage Area = Area is less than 16 square inches. Disposal in Enclosed Containers = Waste solvent is properly disposed of in enclosed containers.
PRO-F UNIT	40 CFR Part 60, Subpart DDD	60DDD	Manufactured Product = Polypropylene or polyethylene. Polyolefin Production = More than one polyolefin is produced. Continuous Process = The affected facility process is continuous. Construction/Modification Date = On or before September 30, 1987.
05RSY207	40 CFR Part 60, Subpart RRR	RSY207RRR	Chemicals Listed in 40 CFR § 60.707 = The affected facility is not part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.

* - The "unit attributes" or operating conditions that determine what requirements apply

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 3373	Issuance Date: 04/16/2012
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.261	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 09/04/2000
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 09/04/2000
Number: 106.371	Version No./Date: 09/04/2000
Number: 106.373	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 03/14/1997
Number: 106.511	Version No./Date: 09/04/2000
Number: 106.532	Version No./Date: 03/14/1997
Number: 87	Version No./Date: 09/12/1989
Number: 99	Version No./Date: 01/08/1980

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sandblasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the “Maximum Allowable Emission Rate Table”, or “MAERT” for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit’s compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Compliance Assurance Monitoring (CAM):

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information	
ID No.: 05FLR110	
Control Device ID No.: 05FLR040	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121
Pollutant: VOC	Main Standard: § 115.121(b)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: once per day	
Averaging Period: n/a	
Deviation Limit: No visible emissions. If visible emissions are observed the permit holder shall either report a deviation or determine visible emissions consistent with Test Method 22 or Test Method 9.	
Basis of CAM: It is widely practiced and accepted to monitor flares for visible emissions by closed circuit cameras and visual inspection. Visible emissions observations indicate that the flare is not efficiently combusting the emissions or there is incomplete combustion. Visible emissions can indicate an improper inlet flow rate or net heating value of the emissions routed to the flare. Monitoring visible emissions is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart A; 30 TAC Chapter 111; and 30 TAC Chapter 115. This procedure is consistent with the EPA "CAM Technical Document" (August 1998) which provides an example of using "EPA Test Method 22-like" procedures for determining visible emissions.	

Unit/Group/Process Information	
ID No.: GRP05CS010	
Control Device ID No.: 05FLR040	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: GRVT10R5121
Pollutant: VOC	Main Standard: § 115.121(b)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: once per day	
Averaging Period: n/a	
Deviation Limit: No visible emissions. If visible emissions are observed the permit holder shall either report a deviation or determine visible emissions consistent with Test Method 22 or Test Method 9.	
Basis of CAM: It is widely practiced and accepted to monitor flares for visible emissions by closed circuit cameras and visual inspection. Visible emissions observations indicate that the flare is not efficiently combusting the emissions or there is incomplete combustion. Visible emissions can indicate an improper inlet flow rate or net heating value of the emissions routed to the flare. Monitoring visible emissions is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart A; 30 TAC Chapter 111; and 30 TAC Chapter 115. This procedure is consistent with the EPA "CAM Technical Document" (August 1998) which provides an example of using "EPA Test Method 22-like" procedures for determining visible emissions.	

Unit/Group/Process Information	
ID No.: GRP05VT003	
Control Device ID No.: 05INCo30	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: GRVT3R5121
Pollutant: VOC	Main Standard: § 115.121(b)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: It shall be considered a deviation if the combustion temperature is a minimum of 1,640 °F.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: 05DEG208	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Degreasing Processes	SOP Index No.: R5412
Pollutant: VOC	Main Standard: § 115.412(1)
Monitoring Information	
Indicator: Visual Inspection	
Minimum Frequency: monthly	
Averaging Period: n/a	
Deviation Limit: Any monitoring data which indicates noncompliance with the applicable requirements of 30 TAC 115.412(1)(A)-(F) shall be considered and reported as a deviation.	
Basis of monitoring: The monitoring option to cover cold cleaner or the open-top vapor cleaner was included in the EPA "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources. In addition to covering the cleaner records of monthly inspections of equipment is an effective way to ensure that the system is operating in accordance with its design.	

Unit/Group/Process Information	
ID No.: 05FLT051	
Control Device ID No.: 05FLR040	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: FLT51R5121-A
Pollutant: VOC	Main Standard: § 115.121(b)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
Deviation Limit: Absence of Pilot Flame	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	

Unit/Group/Process Information	
ID No.: 05INC-030VNT	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111A
Pollutant: OPACITY	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: once per calendar quarter	
Averaging Period: n/a	
Deviation Limit: There shall be no visible emissions. If visible emissions are observed, the permit holder may report a deviation or perform Test Method 9 and opacity shall not exceed 30%.	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: 05TFL018	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: TFL18R5112
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Internal Floating Roof	
Minimum Frequency: annually	
Averaging Period: n/a	
Deviation Limit: Any monitoring data in which the roof is not floating on the surface of the VOC, if liquid has accumulated on the internal floating roof, the seals are detached, or if there are holes or tears in the seal fabric shall be a deviation.	
<p>Basis of monitoring:</p> <p>The option to monitor VOC emissions by visually inspecting the external floating roof or the internal floating roof was included as an option by the EPA in the “Periodic Monitoring Technical Reference Document” (April 1999) to monitor VOC sources. If the external or internal floating roof is operating in accordance with its design it will meet its control efficiency. Visually inspecting the external floating roof or the internal floating roof is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; and 30 TAC Chapter 115. Measuring and recording the accumulated area of gaps if the tank is equipped with primary seals is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; 40 CFR 63 Subparts VV, DD, and MMM; and 30 TAC Chapter 115.</p>	

Unit/Group/Process Information	
ID No.: 05TFL022	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: TFL22R5112
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Internal Floating Roof	
Minimum Frequency: annually	
Averaging Period: n/a	
Deviation Limit: Any monitoring data in which the roof is not floating on the surface of the VOC, if liquid has accumulated on the internal floating roof, the seals are detached, or if there are holes or tears in the seal fabric shall be a deviation.	
<p>Basis of monitoring:</p> <p>The option to monitor VOC emissions by visually inspecting the external floating roof or the internal floating roof was included as an option by the EPA in the “Periodic Monitoring Technical Reference Document” (April 1999) to monitor VOC sources. If the external or internal floating roof is operating in accordance with its design it will meet its control efficiency. Visually inspecting the external floating roof or the internal floating roof is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; and 30 TAC Chapter 115. Measuring and recording the accumulated area of gaps if the tank is equipped with primary seals is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; 40 CFR 63 Subparts VV, DD, and MMM; and 30 TAC Chapter 115.</p>	

Unit/Group/Process Information	
ID No.: 05TFL023	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: TFL23R5112
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Internal Floating Roof	
Minimum Frequency: annually	
Averaging Period: n/a	
Deviation Limit: Any monitoring data in which the roof is not floating on the surface of the VOC, if liquid has accumulated on the internal floating roof, the seals are detached, or if there are holes or tears in the seal fabric shall be a deviation.	
<p>Basis of monitoring:</p> <p>The option to monitor VOC emissions by visually inspecting the external floating roof or the internal floating roof was included as an option by the EPA in the “Periodic Monitoring Technical Reference Document” (April 1999) to monitor VOC sources. If the external or internal floating roof is operating in accordance with its design it will meet its control efficiency. Visually inspecting the external floating roof or the internal floating roof is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; and 30 TAC Chapter 115. Measuring and recording the accumulated area of gaps if the tank is equipped with primary seals is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; 40 CFR 63 Subparts VV, DD, and MMM; and 30 TAC Chapter 115.</p>	

Unit/Group/Process Information	
ID No.: GRP05COM-VNT	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111A
Pollutant: OPACITY	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: once per calendar quarter	
Averaging Period: n/a	
Deviation Limit: There shall be no visible emissions. If visible emissions are observed, the permit holder may report a deviation or perform Test Method 9 and opacity shall not exceed 30%.	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on June 9, 2015.

Site rating: 1.29 / Satisfactory

Company rating: 4.91 / Satisfactory

(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55 ; Unsatisfactory > 55)

2. Has the permit changed on the basis of the compliance history or site/company rating?No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?No

2. Is a compliance plan and schedule included in the permit?.....No

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes

OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes

OP-UA3 - Storage Tank/Vessel Attributes

OP-UA4 - Loading/Unloading Operations Attributes

OP-UA5 - Process Heater/Furnace Attributes

OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes

OP-UA7 - Flare Attributes

OP-UA8 - Coal Preparation Plant Attributes

OP-UA9 - Nonmetallic Mineral Process Plant Attributes

OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes

OP-UA11 - Stationary Turbine Attributes

OP-UA12 - Fugitive Emission Unit Attributes

OP-UA13 - Industrial Process Cooling Tower Attributes

OP-UA14 - Water Separator Attributes

OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes

OP-UA16 - Solvent Degreasing Machine Attributes

OP-UA17 - Distillation Unit Attributes

OP-UA18 - Surface Coating Operations Attributes

OP-UA19 - Wastewater Unit Attributes

OP-UA20 - Asphalt Operations Attributes

OP-UA21 - Grain Elevator Attributes

OP-UA22 - Printing Attributes

OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes

OP-UA25 - Synthetic Fiber Production Attributes

OP-UA26 - Electroplating and Anodizing Unit Attributes

OP-UA27 - Nitric Acid Manufacturing Attributes

OP-UA28 - Polymer Manufacturing Attributes

OP-UA29 - Glass Manufacturing Unit Attributes

OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes

OP-UA31 - Lead Smelting Attributes

OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes

OP-UA33 - Metallic Mineral Processing Plant Attributes

OP-UA34 - Pharmaceutical Manufacturing

OP-UA35 - Incinerator Attributes

OP-UA36 - Steel Plant Unit Attributes

OP-UA37 - Basic Oxygen Process Furnace Unit Attributes

OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes

OP-UA39 - Sterilization Source Attributes

OP-UA40 - Ferroalloy Production Facility Attributes

OP-UA41 - Dry Cleaning Facility Attributes

OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes